

## The Solid Swivel Co Limited & Solid Stampings Limited Privacy Notice

We are committed to processing personal information about our stakeholders in ways that comply with our legal obligations as well as being clear with customers, external providers, regulators and other interested parties about what we do with their personal data. Our aim is to collect information to provide excellent service, to meet our compliance obligations and ensure that the data we hold is relevant, current and useful.

This Privacy notice also applies to the website, applications in general and communications conducted.

### Definitions and Key Terms

**Data Subjects** are those whose personal details are held by another party. Our data subjects include our employees, contractors, suppliers and customers.

**Personal Data** is the data that identifies a subject for instance name, location, financial details, contact names, telephone numbers and e-mail. It might also include intellectual property such as customer drawings or specifications.

**Sensitive Personal Data** may include information relating to health, ethnicity, sexuality or political views.

### Personal information that we collect

We collect a range of personal information relating to you, including:

Organisation and contact name

Address

E-mail address

Telephone number

Feedback on how we are performing

Supplier competence information

Banking, VAT and company registration

Contract information

## **The purposes of holding data from our stakeholders**

We shall only collect and use your personal data for specific and legitimate business purposes, we will limit ourselves strictly to what is truly necessary.

We maintain your contact information up to date as we communicate with customers, prospective clients and external providers within the framework of our day to day business and contractual obligations. We also allow you to contact us and submit your contact information and interest via telephone, e-mail, our website, general conversations or when requesting information.

When you as an interested party provide and entrust us with your personal data for processing at your instruction, we will use it only for the purpose that you intend, never for any other purpose.

To avoid repetition the purposes of holding information are also listed in the following section, how we use your personal information.

## **How we use your personal information**

We use your personal information as follows:

To maintain our relationship with you whilst you are a customer, external provider or other stakeholder.

To process or place orders, and provide or receive agreed goods and services between us.

For invoicing, processing payments, account set up and maintenance.

To communicate with you, including to respond to information.

Requests/enquiries submitted and/or to obtain feedback on products and services.

For record keeping, statistical analysis and internal reporting and research purposes.

To ensure data security.

To notify you about changes to our products and services.

To decide on and notify price changes.

For logistical purposes, including to plan and log delivery routes.

To obtain credit references, credit checks and for debt collection, for risk management purposes.

To meet statutory and regulatory requirements.

To obtain future business.

## **Customers, external suppliers, authorities, regulators or other stakeholders**

Your information may be obtained within the framework of our day to day communications or contractual obligations. We also allow you to contact us and submit your information and interest via telephone, e-mail, fax, through our website or in general conversations when requesting information.

We may request further information if you wish to open a credit account during such opening procedures.

We only collect data for specific reasons as previously described under the heading the purposes of holding data.

If using our website "Contact Us" link you should be aware that we use the details that you have provided in order to answer your enquiry.

Our website directs you to this Privacy notice automatically through the use of hyperlinks. We strive to review and keep our Privacy notice current, so ask you periodically to revisit it in order that you are in receipt of up to date information.

## **Data mapping and risk assessment**

The company carries out data mapping and risk assessment of the principal information and personal data we process and control and review this annually or sooner if change occurs. The mapping process is recorded and maintained to show the principal categories of information that we hold in relation to our stakeholders, the business and members of staff. This process identifies the type of data, source, purpose, description, justification, relevant legal statute or business purpose for holding it. Legal reason for retention, retention period and where the data is held.

## **Third Party Data and Data Sharing**

We may share personal data with other organisations in the following circumstances:

- In order to provide or obtain a trading or personal reference.
- In order to open or maintain an existing credit account it may be necessary for us to obtain a credit check. The Solid Swivel Co Limited & Solid Stampings Limited use the services of Credit Safe (who have a website that describe their activities and security controls)
- In order to recover bad debts or late payments.

## **Data retention**

We retain your personal information for no longer than is necessary for the purposes for which the information is collected. When determining the relevant retention periods we will take into consideration factors including:

- Legal obligation(s) under applicable law to retain data for certain periods of time or for reasons of legal dissent in the event of prosecution or claim.

- Statute limitations under applicable law(s), potential disputes.
- Guidelines issued by relevant data protection authorities.

Otherwise we securely erase your information once it is no longer needed.

### **Legal basis for collecting personal data**

We communicate this Privacy notice to our stakeholders by:

- Issuing it directly.
- Drawing your attention to it and refreshing your knowledge of it by the use of hyperlinks on our website.

### **Consent**

Where possible we will try to achieve explicit consent from stakeholders where it is the most appropriate basis for data processing by asking people to opt in. We keep a record of how and when we obtain consent from an individual and what they were told at the time.

### **Contract**

We rely on this lawful basis to process personal data to:

- Fulfil our contractual obligations to stakeholders and/or
- A stakeholder has asked us to do something before entering into a contract. For example provide a quote.

### **Legal obligation**

This applies where we need to process data to comply with a common law or statutory obligation which does not apply to contract obligations.

### **Vital interest**

Applies when we need to protect someone's life. For instance person entering our workplace with a higher susceptibility to the effect of substances, processes or the need to evacuate quickly in an emergency.

### **Public task**

Processing data to perform a task for an official authority and in the public interest, for instance the fulfilling our environmental permit conditions.

### **Legitimate interest**

Applies where we would reasonably expect that processing personal data would have a minimum privacy impact, balances against the need to process it and the individuals' interests and rights.

## **Your rights**

Whilst examining your rights we wish to point out that various rights are not absolute as each may be subject to exceptions or legal requirements.

We may therefore grant any requests only to the extent that we are allowed and required to do so under data protection law.

### **1. Your right to be informed**

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights.

### **2. The right of access**

You have the right to obtain a copy of your personal information (if we are processing it), and other certain information (similar to that provided in this Privacy Statement) about how it is used.

This is so you are aware and can check that we are using your personal information in accordance with data protection law.

We can refuse to provide information where to do so may reveal personal information about another person or would otherwise negatively impact on another persons' rights.

### **3. The right to rectification**

You can ask us to take reasonable measures to correct your personal information if it is inaccurate or incomplete. E.g. if we have the wrong financial details.

### **4. The right to erasure**

This is also known as “the right to be forgotten” and in simple terms, enables you to request the deletion or removal of your personal information where there is no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure, there are exceptions, e.g. where we need to use the information in defence of a legal claim.

### **5. The right to restrict processing**

You have rights to “block” or suppress further use of your personal information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your personal information, but may not use it further. We will keep lists of people who have asked for further use of their personal information to be “blocked” to make sure the restriction is respected in future.

### **6. The right to data portability**

You have rights to obtain and reuse certain personal information for your own purposes across different organisations. This enables you to move, copy or transfer your personal information easily between our IT systems and theirs (or directly to yourself) safely and securely, without affecting its usability. This only applies to your personal information that you have provided to us that we are

processing with your consent or to perform a contract which you are a party to which is being processed by automated means.

## **7. The right to object**

You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time in so far as that process takes place for the purposes of legitimate interests pursued by our group of companies or a third party, such as a government department. We will be allowed to continue to process the personal data if we can demonstrate compelling legitimate grounds for processing which override your interests' rights or freedoms or we need this for the establishment, exercise or defence of legal claims.

## **8. Rights in relation to automated decision making and profiling**

You have the right not to be subject to a decision based solely on automated processing (including profiling), which significantly affects you, subject to some exceptions. Where this is the case, you have the right to obtain human intervention, voice your concerns and to have the decision reviewed.

## **Security**

We use reasonable security methods to protect the personal information that we process including:

- Understanding legal obligations and rights under GDPR.
- Competence and due diligence of data controllers and processors.
- Multi-layered anti-virus software.
- Complex password protection and regular password changes.

Data may be stored electronically and manually where physical documents exist. (These are kept in locked file in restricted areas here access is strictly controlled)

Confidential information is strictly separated from general access and is regulated on a need to know basis. Operators may only access what is necessary for them to perform their job role.

The company maintains cyber essentials accreditation.

## **Website**

If you fill in a contract form or website request we link this to your personal data. This enables us to endeavour to meet your specific requests which we feel to be a legitimate business process.

Privacy settings:

We do not use "cookies" as part of our normal business procedure.

## **Updating this statement**

We review our privacy practices from time to time. We ask that you bookmark and periodically review this page for updates to our Privacy notice. We reserve the right to modify this policy effective seven (7) days after the posting of the revised Privacy notice.

Hyperlinks on our website direct you to this Privacy notice. We urge you to revisit it periodically in order that you are aware of the current issue and its content.

### **Contact us**

For further information regarding these rights, about this Privacy notice generally or to make a complaint please contact Mr. Peter Killey on [peter@solidswivel.co.uk](mailto:peter@solidswivel.co.uk) or by calling + 44 1384 636421.

Please provide as much information as possible to help us identify the information you are requesting, the action you are wanting us to take and why you believe this action should be taken.

Before assessing your request, we may request additional information in order to identify you. If you do not provide the requested information and, as a result we are not in a position to identify you, we may refuse to action your request.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if this is necessary taking into account the complexity and number of requests that you have submitted.

We will not charge you for such communications or actions we take, unless:

You request additional copies of your personal data.

Undergoing processing, in which case we may charge for our reasonable administrative costs, or

You submit manifestly unfounded or excessive requests, in particular because of their repetitive character in which case we may either (a) charge for our reasonable costs or (b) refuse to act on the request.

If after contacting the group you are still unhappy you may also complain to the Information Commissioner, all contact details are available on the Information Commissioners' website. [ico.org.uk](http://ico.org.uk).